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## APPLIED ENVIRO-TECH INCORPORATED

June 16, 1999

Mr. Emil Klawitter  
Remedial Project Manager  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Mail Stop 82  
Lester, PA 19113-2090

Dear Mr. Klawitter,

Applied Enviro-Tech, Inc. (Applied), Technical Advisor for the TAG, and on behalf of the Rhode Island Resource Conservation & Development Council, Inc. (RI RC&D) is pleased to submit comments on the Draft - Study Area 16 (Creosote Dip Tank and Fire Fighting Training Area) Comprehensive Report/Study Area Screen Evaluation at NCBC Davisville, RI.

Our comments and questions are as follows:

- 1) Why were groundwater samples obtained utilizing hydraulically driven probes as opposed to augered wells and was sufficient groundwater available in those wells to insure sufficient well development and water volume for representative samples?
- 2) Page 2 of the executive summary and page 4 of Chapter 1 discusses a previous investigation of Study Area 16 that included a 1992 soil removal action. TPH compounds were left behind at a documented level. How do those levels of contaminants compare with RI DEM's current objectives?
- 3) The recommendations of this study should include ecological as well as human health risk evaluations.

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- 4) The recommendations state additional remedial actions are not anticipated for soil based on current data. This recommendation is premature and inconsistent with an earlier recommendation to identify the source area for CVOC's.
- 5) Why was the Total Petroleum Hydrocarbon (TPH) analysis 418.1 utilized for soil samples as opposed to the 8100 series or Extractable Petroleum Hydrocarbon (EPH) method?

Recommendations in this report do not include further work for the SVOC's or arsenic lead and beryllium in soil even though concentrations of those compounds exceeded the RI DEM Direct Soil Exposure Criteria and/or EPA Region IX Residential RBC. What is the justification for dropping these compounds from further study? Metals in groundwater were field filtered according to this report. How were background levels of metals in groundwater sampled? Doesn't EPA Methodology require low flow sampling for metals and can these two sampling methodology results be compared reliably?

Please call Anne Heffron, Technical Advisor, @ (401) 792-8260 should you have any concerns regarding the above. Thank you.

Sincerely,  
APPLIED ENVIRO-TECH, INC.



Anne Heffron, RPG

CC:Betsy Morrison

AEH/las